

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	<u>3500 PROTECTIVE ORDER</u>
- v. -	:	
	:	20 Cr. 681 (JPC)
NATALYA SHVARTS,	:	
	:	
Defendant.	:	
-----X	:	

Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Nicholas W. Chiuchiolo and Daniel G. Nessim, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972) (the “Protected Material”), made on consent of defense counsel, and based on the Court’s independent review,

IT IS HEREBY ORDERED that (1) defense counsel must destroy or return to the Government all Protected Material (and any copies thereof) at the conclusion of the *Fatico* hearing of this matter or when any appeal has become final subject to defense counsel’s obligation to retain client files under the Rules of Professional Conduct; (2) the defense and the defendant are precluded from disseminating any of the Protected Material to anyone beyond the defendant (in the presence of counsel), defense counsel, any paralegal or staff or expert witnesses employed by the defense; and (3) the defendant is precluded from viewing, taking, or keeping any paper copies of the Protected Material except when in the presence of defense counsel or any paralegal or staff employed by the defense, or with prior permission of the Court upon notice to the Government,

IT IS FURTHER ORDERED that the defendant, defense counsel, and any paralegal or staff employed by the defense are precluded from publicly disclosing or disseminating the identity of any civilian witnesses referenced in the Protected Material whose identities have not already been disclosed in public court filings. This Order does not prevent the disclosure of the Protected Material in any motion, hearing, or trial held in this action, or to any judge or magistrate judge, for purposes of this action. All filings should comply with the privacy protection provisions of Federal Rule of Criminal Procedure 49.1.


Dated: New York, New York
October 12, 2023




THE HONORABLE JOHN P. CRONAN
UNITED STATES DISTRICT JUDGE

Consented to by:

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: 
Nicholas W. Chiuchiolo
Daniel G. Nessim
Assistant United States Attorneys

By: 
Camille Abate, Esq.
Attorney for Natalya Shvarts